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15

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF ARIZONA**

18 Favorite Healthcare Staffing, LLC, a
19 Kansas limited liability company,

20 Plaintiff,

21 v.

22 IASIS Healthcare Holdings, Inc., St. Lukes
23 Medical Center, L.P., and Mountain Vista
Medical Center, L.P.,

24 Corporate Defendants,
25 and

26 Ralph de la Torre; Michael Callum; and
27 Christopher Dunleavy;

28 Individual Defendants.

Case No. 2:23-cv-01810-DJH

**DEFENDANTS' INITIAL RULE
26(a)(1)(A) DISCLOSURE
STATEMENT**

(Assigned to the Honorable Diane J.
Humetewa)

1

2 This Disclosure Statement is filed on behalf of Defendant IASIS Healthcare
3 Holdings, Inc. (hereinafter “Defendant”), by and through the undersigned counsel, in
4 compliance with the provisions of:

5 X Rule 7.1, Federal Rules of Civil Procedure, a nongovernmental
6 corporate party to an action in a district court must file a statement that identifies any parent
7 corporation and any publicly held corporation that owns 10% or more of its stock or states
8 that there is no such corporation.

9 _____ Rule 12.4(a)(1), Federal Rule of Criminal Procedure, any
10 nongovernmental corporate party to a proceeding in a district court must file a statement that
11 identifies any parent corporation and any publicly held corporation that owns 10% or more
12 of its stock or states that there is no such corporation.

13 _____ Rule 12.4(a)(2), Federal Rule of Criminal Procedure, if an
14 organizational victim of alleged criminal activity is a corporation the government must file
15 a statement identifying the victim and the statement must also disclose the information
16 required by Rule 12.4(a)(1).

17 **The filing party hereby declares as follows:**

18 _____ No such corporation.

19 _____ Party is a parent, subsidiary or other affiliate of a publicly owned
20 corporation as listed below. (Attach additional pages if needed.)

21

22 _____ Publicly held corporation, not a party to the case, with a financial
23 interest in the outcome. List identity of corporation and the nature of financial interest.
24 (Attach additional pages if needed.)

25

26 X Other (please explain):

27 IASIS Healthcare Holdings, Inc. is the 1% owner of St. Luke’s Medical Center, LP. IASIS
28 Healthcare Holdings, Inc. is the 1.1% owner of Mountain Vista Medical Center, LP. IASIS

1 Healthcare Holdings, Inc. is a wholly owned subsidiary of IASIS Healthcare LLC. The sole
2 member of IASIS Healthcare LLC is IASIS Healthcare Corporation. IASIS Healthcare
3 Corporation is a wholly owned subsidiary of Steward Health Care System, LLC. No public
4 corporation owns more than 10% of its stock.

5
6 **A supplemental disclosure statement will be filed upon any change in the**
7 **information provided herein.**

8 Dated: December 12, 2023

9 HUSCH BLACKWELL LLP

10 By: /s/ Theresa M. Mullineaux

11 Brendan A. Melander

12 Brandon S. Stein

13 Matthew D. Knepper (pro hac vice)

14 Theresa M. Mullineaux (pro hac vice)

15 *Attorneys for Defendants IASIS Healthcare
Holdings, Inc.; St. Lukes Medical Center, L.P.;
Mountain Vista Medical Center, L.P.;
Ralph de la Torre; Michael Callum; and
Christopher Dunleavy*

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of December, 2023, I electronically filed this document with the Clerk of the Court using the ECF system.

The ECF system will send notification of such filing to:

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/s/ *Lynette Miller*

Lynette Miller